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Signed: September 4, 2013


ALAN JAROSLOVSKY U.S. Bankruptcy Judge

Attorneys for Plaintiff

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re:

MENDOCINO COAST HEALTH CARE
DISTRICT, a political subdivision of the State
of California,

Debtor.

MENDOCINO COAST HEALTH CARE
DISTRICT, a political subdivision of the State
of California,

Plaintiff,

v.

UHC OF CALIFORNIA, THE OFFICE OF
STATEWIDE HEALTH PLANNING AND
DEVELOPMENT OF THE STATE OF
CALIFORNIA,

Defendants.

Case No.: 12-12753

Chapter 9

Adv. Proc. No. 13-01026

**STIPULATION AND ORDER TO TAKE
TRIAL OFF CALENDAR AND
CONTINUE RELATED PRETRIAL
DEADLINES**

[Pursuant to Fed. R. Bankr. P. 7016(b)]

Mendocino Coast Health Care District ("District"), and UHC of California ("UHC"), have reached an agreement in principle to settle this adversary proceeding, subject to the consent of the Office of Statewide Health Planning and Development of the State of California ("OSHDP", and, collectively with the District and UHC, the "Parties"), and therefore stipulate, by and through their counsel, as follows:

RECITALS

A. On June 25, 2013, the Bankruptcy Court entered its *Scheduling Conference Order and Notice of Trial* [Docket No. 12] ("Pretrial Order"). Pursuant to the Pretrial Order a trial is scheduled on November 20, 2013, at 9:00 a.m., and the deadline to complete discovery was fixed at October 18, 2013.

B. On July 10, 2013, the Bankruptcy Court entered a *Stipulated Scheduling Order Between the Plaintiff and Defendants Regarding Disclosures and Discovery* [Docket No. 13], which sets forth certain deadlines pertaining to discovery, evidence and pretrial briefing ("Pretrial Deadlines").

C. The District and UHC have reached an agreement in principle to settle the litigation, subject to the consent of OSHPD. The Parties anticipate that it may take additional time to fully document the proposed settlement before filing a motion for its approval by the Bankruptcy Court.

NOW THEREFORE, the Parties have met and conferred and hereby stipulate and agree:

STIPULATION AND ORDER

1. The trial date of November 20, 2013 at 9:00 a.m. is taken off calendar. All Pretrial Deadlines are continued indefinitely.

2. In the event that the Parties are unable to finalize the settlement by November 30, 2013, the District may request a status conference for the Bankruptcy Court to consider a new trial date and related pretrial and discovery deadlines.

Dated: September 4, 2013

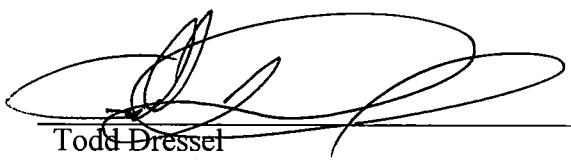
PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Henry C. Kevane
Henry C. Kevane
Attorneys for the District

1 Dated: August 30th, 2013

CHAPMAN AND CUTLER LLP

3 By


Todd Dressel
Attorneys for UHC

5 Dated: August __, 2013

CALIFORNIA ATTORNEY GENERAL'S OFFICE

8 By

Jane O'Donnell
Attorneys for the Office of Statewide Health
Planning and Development of the State of
California

11 Based on the foregoing stipulation of the Parties, IT IS SO ORDERED.

13 * * * END OF ORDER * * *

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1 Dated: August __, 2013

CHAPMAN AND CUTLER LLP

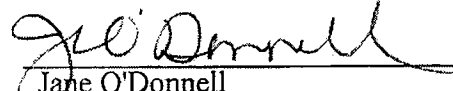
2
3 By

Todd Dressel
Attorneys for UHC

4
5 Dated: August 30, 2013

CALIFORNIA ATTORNEY GENERAL'S OFFICE

6
7 By


Jane O'Donnell
Attorneys for the Office of Statewide Health
Planning and Development of the State of
California

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13 * * * END OF ORDER * * *

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